

Marlene H. Dotch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th SW
Washington, DC 20554

Monday, April 15, 2013

Dockets 10-51 and 13-24

I am writing to provide my comments on the January 25th, 2013, FCC Order on Internet Protocol Captioned Telephone Service ("IP-CTS").

I use IP-CTS at work. I am opposed to the new rule requiring "default off" setting and users to take an affirmative step to select captions at the beginning of each and every call made or received.

The new requirements create a delay in the provisions of captions to users as the system must begin its connection to the relay center and captioning agent *after* the conversation has already begin. The effect of this delay is to hinder a service that is depended on and essential for users to execute their core job functions.

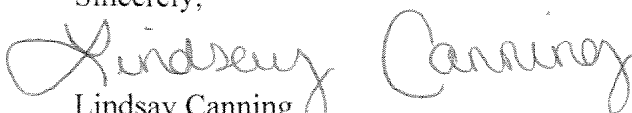
The beginning to a phone conversation is often the time when key information is exchanged. It is also when the purpose and tone of the conversation is established. The pronounced delay in captioned caused by having to select captions at the beginning of each call does not result in a functionally equivalent service, but a service where the users need to ask callers to repeat what they have said in order to have the full benefit of telecommunications. This is particularly damaging in a work environment, where business relationships and deals are often established and negotiated via telephone calls. The delay causes embarrassment, lack of confidence, and hinders the ability to perform core work duties.

Selecting captions at the beginning of each call made or received, and the subsequent delay in captions, interrupts the flow of natural telephone conversation. The nature of IP-CTS service, with the caption interpreter invisible to parties on the call, heightens the need for the text to be provided without delay in order to provide a service without interruption.

The phone I use captions on is on the phone assigned to be my employer that is not used by anyone other than me. There is no risk that someone else will use captions on my phone. The default-off requirement denies the user access to captioning through delaying the connection to a CA. And in my case, like most people who use IP-CTS at work, there is no risk of unintentional misuse. The rule essentially avoids no harm, and denies critical access to services that that is greatly beneficial.

This service provides an invaluable accommodation to me at work. Please do not erode the utility of this important service for users who rely on it at work.

Sincerely,



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